

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

ASHEVILLE DIVISION

JANE ROE,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil No. 1:20-cv-00066-WGY
)	
UNITED STATES OF AMERICA, <i>et al.</i>,)	
)	
<i>Defendants.</i>)	
)	
)	

**PLAINTIFF’S RESPONSE TO DEFENDANTS’ JOINT NOTICE
REGARDING EARLY DISCOVERY REQUESTS**

On August 29, 2020, defendants filed a “Joint Notice Regarding Early Discovery Requests” (“Joint Notice”) regarding Roe’s second set of discovery requests, which her counsel served on defendants on July 31, 2020. ECF No. 64. Defendants reiterated their position that the local rules “expressly prohibit discovery at this early stage of the litigation” and that discovery is prohibited prior to resolution of the individual defendants’ qualified-immunity defenses. *Id.* at 1.

In response to defendants’ notice, Roe hereby incorporates by reference, pursuant to Fed. R. Civ. P. 10(c), the arguments set forth in “Plaintiff’s Response in Opposition to Defendants’ Joint Motion to Set Deadline to Respond to Early Discovery Requests,” ECF No. 55, and in “Plaintiff’s Motion for a Case Management Conference and Any Other Appropriate Relief,” ECF No. 66. In those filings, Roe set forth the reasons why discovery was both proper and ongoing when her discovery requests were served. Those reasons apply with equal force to Roe’s second set of discovery requests and defendants’ Joint Notice.

This the 14th day of September, 2020.

Respectfully Submitted,

/s/ Cooper Strickland

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of September, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Gill P. Beck at Gill.Beck@usdoj.gov

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